

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

FINANCIAL OVERSIGHT AND
ADMINISTRATION BOARD FOR
PUERTO RICO,

As a representative of the

COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.

PROMESA
Title III

Number 17BK 3283-LTS

(Jointly administered)

**MOTION ASKING TO INCLUDE MEMBERS OF THE GROUP THAT WERE NOT
INCLUDED**

To the Honorable United States Court Judge Laura Taylor Swain:

The group of plaintiffs under the case Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico, before the Public Service Appellate Commission (CASP), under number 2000-06-1639, Case before the Supreme Court of Puerto Rico CC-2012-1050, file this Motion and respectfully state the following:

1. On June 2, 2023 we received NOTICE OF ADJOURNMENT OF OMNIBUS OBJECTIONS SCHEDULED FOR HEARING AT THE JUNE 7, 2023 OMNIBUS HEARING TO THE AUGUST 30, 2023 OMNIBUS HEARING.
2. Upon analysis of our records, we noticed the number of claims of our group stated on Appendix 1 didn't match the numbers of claim we have. For this reason, we searched on

the Kroll webpage and asked our clients to send us their claim numbers to see if they were not included on the Notice.

3. After this task we found a group of clients that were not included on the Notice, but were part of the case against the Department of Health and precented the Proof of Claim on time. We are including a list with these clients' names, claim number and date filed as Appendix I of this Motion. We're also including a table combining both tables.
4. All these clients are part of the group of plaintiffs under the Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico. It should also be noted that we were the only active lawyer on the case, so that any other creditor who based the proof of claim on the case should be added to our group.
5. This case hasn't been resolved yet, so there shouldn't be any problem to include them in the group.

WHEREFORE, the group of plaintiffs under the Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico respectfully requests that this honorable court approve this MOTION ASKING TO INCLUDE MEMBERS OF THE GROUP THAT WERE NOT INCLUDED, update record so that the clients listed on the Appendix I are included on the group of plaintiffs under the case Maggie Acevedo Sepúlveda et al. V. Department of Health of Puerto Rico, before the Public Service Appellate Commission (CASP), under number 2000-06-1639, Case before the Supreme Court of Puerto Rico CC-2012-1050 and grant any other remedy deemed just.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all participants of the CM/ECF system including the **Trustee** and **Debtors' counsel**.

Dated: June 9, 2023
Ponce, Puerto Rico

/s/ Santiago A. Iturregui Del Toro
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